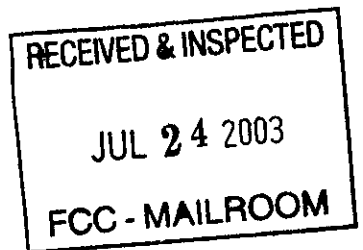


**BEFORE THE
FEDERAL COMMUNICATIONS COMMISSION
WASHINGTON, D.C.**



In the Matter of)	
)	
Amendment of Section 73 202(b))	MB Docket No 02-73
Table of Allotments)	RM 10741
FM Broadcast Stations)	RM 10742
)	
Cameron, Arizona)	
)	

STATEMENT IN RESPONSE TO PUBLIC NOTICE

Tusayan Broadcasting Company, Inc , ("TCBI") by Counsel, and pursuant to the Commission's Public Notice of July 9, 2003, concerning the above-referenced proceeding, hereby submits its statement in opposition of allocation of Channel 273C1 at Grand Canyon Village, AZ, and in opposition to allocation of Channel 247C at First Mesa, AZ.¹

As set forth in its Consolidated Reply Comments filed on MB docket No 02-73, TCBI believes that allocation of Channel 273C1 at Grand Canyon Village, Arizona, and 247C at First Mesa, Arizona are both unsuitable allotments; it therein proposed, and continues to propose that Channel 247C be instead allocated to Marble Canyon, AZ, as that community's first aural service

NPR and 3-Point Media Arizona, LLC now propose, *inter alia*, to allocate Channel 273C1 at Grand Canyon Village. TCBI is the Licensee of Station KSGC (FM), Tusayan, Arizona. Tusayan is the community adjacent to and just outside the gates of Grand Canyon National Park, and is adjacent to Grand Canyon Village. KSGC already serves both Tusayan and

¹TCBI has no objection to the other proposed allocations.

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Grand Canyon Village; Grand Canyon Village is within the city-grade signal area of KSGC. TCBI has also filed Comments in MM Docket No. 02-12, RM 10356, Ash Fork, Arizona, proposing an upgrade of KSGC station on Channel 222, the channel proposed for KSGC by NPR in that proceeding, should the FCC grant TCBI's request for Channel 222C2 in the Ash Fork proceeding, KSGC's signal over Grand Canyon Village as well as over Tusayan and the South Rim of the Grand Canyon will be significantly improved.

TCBI submits that the allocation of 273C1 (rather than Channel 246C1, NPR's and ARP's original joint proposal) at Grand Canyon Village remains unsuitable. As previously stated by TCBI, notwithstanding the fact that Grand Canyon Village is a Census Designated Place, its *raison d'être* is the tourist trade to the Grand Canyon. That population is transient. The Village's 'permanent' population, which consists only of those persons who work in the Village, is also transient, as much of the staff of the restaurants, hotels, motels and other lodges in the Village are college students working during the busy summer season, and the staff is much reduced during the winter when the tourist trade is significantly reduced. Allocation of yet another Class C station to the Village as its third aural service, and second commercial service is unnecessary and superfluous, given the existing commercial service from Tusayan.

The same is true for the proposal for Channel 247C at First Mesa, AZ. As noted by TCBI in its Consolidated Reply Comments, given First Mesa's tiny population, it is equally unsuitable for a third Class C station.


TCBI proposed that Channel 247C be allocated to Marble Canyon as its first aural broadcast outlet.² Marble Canyon, is, like First Mesa, a Census Designated Place, with a small permanent population of 564 persons. However, unlike First Mesa, it is a tourist area, at the 'top' of the

²TCBI hereby incorporates by reference the engineering submitted with its Consolidated Reply Comments, in support of its Statement herein.

Grand Canyon, is located on the Colorado River, and is a starting point for many of the river raft rides down the Colorado through the Grand Canyon. Marble Canyon has a lodge, a post office, and several small retail businesses, including a camping outfitting business, and boasts a small airport. Marble Canyon, unlike First Mesa, has **no** other aural broadcast outlets, and would benefit from a first local service. Under the FCC's *Revision of FM Assignment Policies and Procedures*, 90 FCC 2d 88 (1982), allotment of a first local aural service to a community is of higher priority than allotment of a second or third local aural service. Therefore, TCBI's proposal to allocate Channel 247C to Marble Canyon, AZ, should be preferred over NPR's and 3-Point Media's proposal for Channel 247C at First Mesa, Arizona.

Respectfully submitted,

TUSAYAN BROADCASTING CO., INC.

By 
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July 23, 2003

CERTIFICATE OF SERVICE

I, Denise B. Moline, of the law firm of Denise B. Moline, Esq., hereby certify that I have caused to be served, this 24th day of July, 2003, a copy of the foregoing "**Statement in Response to Public Notice**" by First Class Mail, Postage prepaid, on the following:

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*Courtesy Copy, via Fed Ex